



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 5  
77 WEST JACKSON BOULEVARD  
CHICAGO, IL 60604-3590

AUG 06 2015

**CERTIFIED MAIL 7009 1680 0000 7648 7566**  
**RETURN RECEIPT REQUESTED**

REPLY TO THE ATTENTION OF:

Mr. Ryan Schultz  
Director, Plant Operations  
Henkel Corporation  
420 West Marquette Avenue  
Oak Creek, Wisconsin 53154

Re: Notice of Violation  
Compliance Evaluation Inspection  
WID057163941

Dear Mr. Schultz:

On May 26, 2015, a representative of the U.S. Environmental Protection Agency inspected the Henkel Corporation (Henkel) facility located in Oak Creek, Wisconsin. As a small quantity generator of hazardous waste, Henkel is subject to the Resource Conservation and Recovery Act, 42 U.S.C. § 6901 *et seq.* (RCRA). The purpose of the inspection was to evaluate Henkel's compliance with certain provisions of RCRA and its implementing regulations related to the generation, treatment and storage of hazardous waste. A copy of the inspection report is enclosed for your reference.

Based on information provided by Henkel, EPA's review of records pertaining to Henkel, and the inspector's observations, EPA has determined that Henkel violated a RCRA requirement related to used oil, as described in the paragraph below.

**Henkel violated the following generator requirement:**

Used Oil Requirement

Under Wis. Admin. Code § NR 679.22(3)(a) [40 C.F.R. § 279.22(c)(1)], containers and aboveground tanks used to store used oil at generator facilities must be labeled or marked clearly with the words "Used Oil."

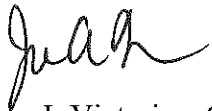
During the inspection of the Main Production Hot Melt Area, there were four 55-gallon drums that were situated on a pallet. All four drums contained used oil as stated by Mr. Schultz. All four drums were labeled as "Waste Oil and Scrap." The four drums were not labeled with the words, "Used Oil."




After the inspection, as documented in a June 1, 2015 email to EPA, you took certain actions to establish compliance with the above used oil requirement. Based on the information received from Henkel on June 1, 2015, EPA is not planning additional enforcement actions based on this inspection at this time. This letter does not limit the applicability of the requirements evaluated, or of other federal or state statutes or regulations. EPA appreciates Henkel's cooperation.

If you have any questions regarding this letter, please contact Mr. Gangwisch, of my staff, at (312) 886-0989 or at [gangwisch.bryan@epa.gov](mailto:gangwisch.bryan@epa.gov).

Sincerely,



 Gary J. Victorine, Chief  
RCRA Branch

Enclosure

cc: James F. Drzewiecki, Henkel, [james.drzewiecki@henkel.com](mailto:james.drzewiecki@henkel.com)  
Michael Ellenbecker, WI DNR, [michael.ellenbecker@wisconsin.gov](mailto:michael.ellenbecker@wisconsin.gov)  
Cynthia Moore, WI DNR, [cynthia.moore@wisconsin.gov](mailto:cynthia.moore@wisconsin.gov)



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 5, LCD, RCRA BRANCH, LR-8J  
77 WEST JACKSON BOULEVARD  
CHICAGO, ILLINOIS 60604

RCRA COMPLIANCE EVALUATION INSPECTION REPORT

**SITE NAME:** Henkel Corporation

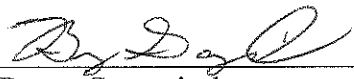
**EPA ID No.:** WID057163941

**ADDRESS:** 420 West Marquette Avenue  
Oak Creek, WI 53154

**DATE OF INSPECTION:** May 26, 2015

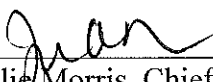
**EPA INSPECTOR:** Bryan Gangwisch

**PREPARED BY:**

  
Bryan Gangwisch  
Environmental Scientist  
Compliance Section #2

6/3/15  
Date Completed

**APPROVED BY:**

  
Julie Morris, Chief  
Compliance Section #2

6/8/15  
Date

### **Purpose of Inspection**

This inspection was an evaluation of Henkel Corporation (Henkel), and its compliance with hazardous waste regulations found at Wisconsin Administrative Code (WAC) and the Code of Federal Regulations (CFR). The inspection was a Federal lead RCRA Compliance Evaluation Inspection (CEI).

### **Participants**

Ryan Schultz, Director, Plant Operations	Henkel
James F. Drzewiecki, Manager, Safety, Health & Environmental	Henkel
Mike Jasperson, Laboratory Technician	Henkel
Bryan Gangwisch, Environmental Scientist	U.S. EPA

### **Introduction**

I arrived at the site at approximately 12:23 p.m. The weather consisted of overcast conditions with a light wind, light rain, and an ambient air temperature of approximately 77 degrees Fahrenheit. I introduced myself, presented my inspector credentials, and described the purpose of the inspection and the process by which I intended to conduct the inspection. Mr. Schultz and Mr. Drzewiecki provided me with a verbal description of the site, led the tour throughout the facility, and then provided me with the records I requested for review.

### **Site Description**

Henkel was operating as a small quantity generator at the time of the inspection based upon hazardous waste generation rates and as stated by Mr. Schultz and Mr. Drzewiecki.

The following facility description and waste generation information was stated by Mr. Schultz and Mr. Drzewiecki unless otherwise noted. The facility is owned and operated by Henkel Corporation. The original part of the facility was constructed in the 1950s. The current facility sits upon fourteen acres. Henkel acquired the land and the facility in 1996. In 2013, Henkel constructed the Warehouse portion of the facility. Henkel performs adhesive manufacturing that mainly serves the automotive industry. The facility operations consist of offices, laboratory testing and painting – technical customer service (TCS) and quality control, production, maintenance, and warehousing. There are approximately 97 total employees that work three shifts five days per week at the facility, and Saturdays as needed.

There was one hazardous waste storage area located in the facility. There were approximately two satellite accumulation areas (SAA) located throughout the facility. The containers that are used to manage hazardous waste at Henkel consist of 55-gallon drums or smaller containers. There were four parts washers at the facility. There were no hazardous waste tanks at the facility. No waste is stored outside of the facility. There were no waste water treatment operations at the facility. There was no discharge capability outside of the facility.

There were approximately fifteen raw material tanks at the facility.

The facility became a large quantity generator in 2013 due to a combination of an inventory cleanout from the Warehouse, and hazardous waste generated from the TCS Laboratory.

The main waste streams generated at Henkel consist of: waste paints, waste solvents, waste aerosols, waste rags, waste dust, waste empty calcium oxide bags, waste return liners, bags, and paste purge (non-liquid), cardboard, and plastic. The hazardous waste codes associated with the main waste types that are generated at Henkel consist of: D001. The facility's generated electronic waste is sent to Henkel's corporate office, and then is sent for recycling. The generated spent universal waste lamps and batteries were being picked up by Recycle Technologies, Inc. (Milwaukee, WI), for recycling. Used oil is generated and is being picked up by Heritage Crystal Clean (Hartland, WI) for recycling. The facility's cardboard is being picked up by Advanced Waste Recycling for recycling. Henkel's wooden and plastic pallets are picked up by BTL Pallets (Oak Creek, Wisconsin) for recycling.

The facility has an air permit (dust collector), and a storm water permit with the Wisconsin Department of Natural Resources (WDNR).

### **Site Tour**

A physical walk-through of the facility was conducted at approximately 1:50 p.m. We started in the Offices. There was one box that was labeled as "Universal Waste Batteries", was dated 4/1/15, and was closed.

Next, I inspected the Front Dock Area. This area involves raw material mixing. There was no waste in this area at the time of the inspection. Mr. Schultz stated that incoming raw material comes in the form of bulk, fifty pound bags, 55-gallon drums, and 5-gallon pails. Henkel typically sends out their product in 55-gallon drums or 300-gallon totes as stated by Mr. Schultz.

At the Main Production area, there was one parts washer. Mr. Schultz stated that the parts washer utilizes high flash mineral spirits and is managed as non-hazardous waste when Heritage comes to service the parts washers at the facility.

Next, I inspected the Central Hazardous Waste Storage Area. There was no waste in this area at the time of the inspection. Mr. Schultz stated that weekly inspections of the Central Hazardous Waste Storage Area are conducted, and he provided the weekly inspection checklist for the area. There was a fire extinguisher, spill control equipment, decontamination equipment, and a phone in the vicinity.

Still at the Main Production area, there was another parts washer observed. There was one flammable cabinet that had one 55-gallon drum inside of it. The drum was labeled as "Soiled Rags", and was closed. Mr. Schultz and Mr. Drzewiecki stated that the rags were dirty rags with no solvent contamination.

Still at the Main Production area, at the Schedule Board area, there was a phone that had the following posted next to it: emergency coordinator's (Mr. Schultz) name and phone number, fire extinguisher, fire alarm, and spill control equipment locations, and the phone number for the fire department. Mr. Schultz stated that the facility's fire alarms signal ADT, which then signals the fire department. Mr. Schultz also stated that the entire facility is equipped with a sprinkler system and a public address system.

Still at the Main Production area, there was a raw material storage intermediate area. The material stored in this area was due to product containers not being filled to the saleable capacity, material that will be re-worked into product, and finished product as stated by Mr. Schultz and Mr. Drzewiecki.

Next, I inspected the Scrap Area. There was one roll-off box that was dedicated for the storage of non-hazardous waste (empty raw material containers, liners, bags) as stated by Mr. Schultz. There was also a sign hanging above the roll-off that read "Non-Hazardous Waste." There was one roll-off box that was dedicated for the storage of dust collection powder as stated by Mr. Schultz. There was also a sign hanging above the roll-off that read "Dust Collection Powder Only." There were three semi-trailers that contained empty drums to be sent for reconditioning, or returned drums as stated by Mr. Schultz. There were several 55-gallon drums and 5-gallon pails, situated on pallets, which were empty or contained liners and bags. There were 300-gallon totes that were labeled as "Non-Hazardous Waste."

At the Compactor Room, there was one 55-gallon drum that was labeled as "Non-Hazardous Waste and Scrap." There was a spill control kit in the vicinity.

Next, I inspected an area back at the Main Production area. There were several ½ cubic-yard hoppers, situated on three shelves, which contained intermediated product masticated rubber as stated by Mr. Schultz and Mr. Drzewiecki.

Outside of the facility, I observed the dust collector system. There were 55-gallon drums (on pallets) that contained the waste dust, and empty 55-gallon drums (on pallets) to be utilized in the system. A picture was taken. The roll-off box dedicated for the calcium oxide bags, was observed.

Next, I inspected the Warehouse. There was raw material product storage in this area as stated by Mr. Shultz and Mr. Drzewiecki. There was no waste in this area at the time of the inspection.

Back outside of the facility, I observed six former raw material storage tanks that were empty and out of service since approximately 2006, as stated by Mr. Schultz and Mr. Drzewiecki.

At the Maintenance area, there was one cardboard container that contained spent four foot fluorescent bulbs. The container was labeled as "Universal Waste Light Bulbs", dated 1/1/15, and was closed. There was a SAA that consisted of one 55-gallon container that was labeled as

“Hazardous Waste”, “Aerosol Can Based Waste”, and “Flammable Liquid Aerosol”, and was closed. There was a parts washer and a spill control drum in the area.

Next, I inspected the Main Production Hot Melt Area. There were four 55-gallon drums that were situated on a pallet. All four drums contained used oil as stated by Mr. Schultz. All four drums were labeled as “Waste Oil and Scrap.” Pictures were taken.

At the TCS Laboratory, there was one flammable closet. Inside of the closet were several 1-gallon cans of product paint as stated by Mr. Schultz and Mr. Drzewiecki. I asked the laboratory technician (Mike Jasperson) about the usage and management of the fabric paint booth filters. Mr. Jasperson stated that the filters were in use, and had not been disposed of during his time of employment. Mr. Jasperson also stated that the paint booth is not utilized frequently. There was no waste in this area at the time of the inspection.

Next, I inspected the TCS Mixing Room. There were four 55-gallon drums situated on a pallet. All four drums were labeled as “Non-Hazardous Waste”, and were closed. Mr. Schultz stated that the four drums contained retain and mixing samples. There was a parts washer in the area.

### **Record Review**

The review of manifests was conducted at approximately 3:26 p.m. Manifests are kept on-site for at least 3 years. The most recent manifests show that all hazardous waste is sent to the following TSDFs: Badger Disposal of WI, Inc. (WID988580056), Veolia ES Technical Solutions (ILD098642424), and Veolia ES Technical Solutions (WID003967148). The following transporters were also used: Veolia ES Technical Solutions (NJD080631369) and Badger Disposal of WI, Inc., (WID988580056). All LDR notices were available for review on each manifest for each waste stream.

The most recent shipment of universal waste bulbs and batteries was documented. On December 5, 2014, Recycle Technologies, Inc., picked up a load of universal waste bulbs and batteries. The most recent used oil pick ups were also documented. There were used oil pickups on April 18, 2014, and September 12, 2014.

Weekly inspections were occurring for the Central Hazardous Waste Storage Area. Mr. Schultz conducts the weekly inspections. Emergency equipment inspections were also occurring. The facility’s fire extinguishers are inspected monthly by TYCO Simplex Grinnell (Menomonee Falls, Wisconsin). The Oak Creek Fire Department conducts annual tours of the facility as stated by Mr. Schultz.

The last three submitted annual hazardous waste reports were retained on-site.

Waste determinations were documented through analytical testing, waste profiles or determined by generator knowledge (MSDS). I reviewed the waste profiles for the following waste streams: cured plastisol and corrosion coating, dust, and calcium oxide bags. I reviewed the MSDS for the following: Terolan 1285, Terolan 782.4, Terolan 03 – 1198, Terolan 1284, Terolan 1284 O,

Terolan 986 HV, Terotex 3599-5, calcium oxide bags, and crystal clean 142 mineral spirits (parts washer solution). I also reviewed the analytical report and TCLP results (6/28/01) for the dust, provided by U.S. Analytical Lab (WDNR certified # 445134030).

There was a RCRA hazardous waste management training program in place at the facility. The training curriculum was observed. The facility annual RCRA training sign-in sheets/database documentation that documented that the annual RCRA trainings were conducted and received for year 2013, when the facility became a large quantity generator, were forthcoming as stated by Mr. Schultz and Mr. Drzewiecki.

#### **Closing Conference**

I summarized the RCRA requirements for the following: used oil labeling identified during the inspection. The inspection concluded at approximately 5:45 p.m.

Henkel made no claim of confidential business information related to any pictures taken by U.S. EPA during the inspection.

Documents received during this inspection are as follows:

- none

Documents given to Henkel during this inspection are as follows:

- U.S. EPA Small Business Resources handout (compliance assistance)
- Region 5 and State Pollution Prevention contact handout
- SHWEC Pollution Prevention handout

A photo log is attached consisting of four (4) photos taken by U.S. EPA during the inspection.



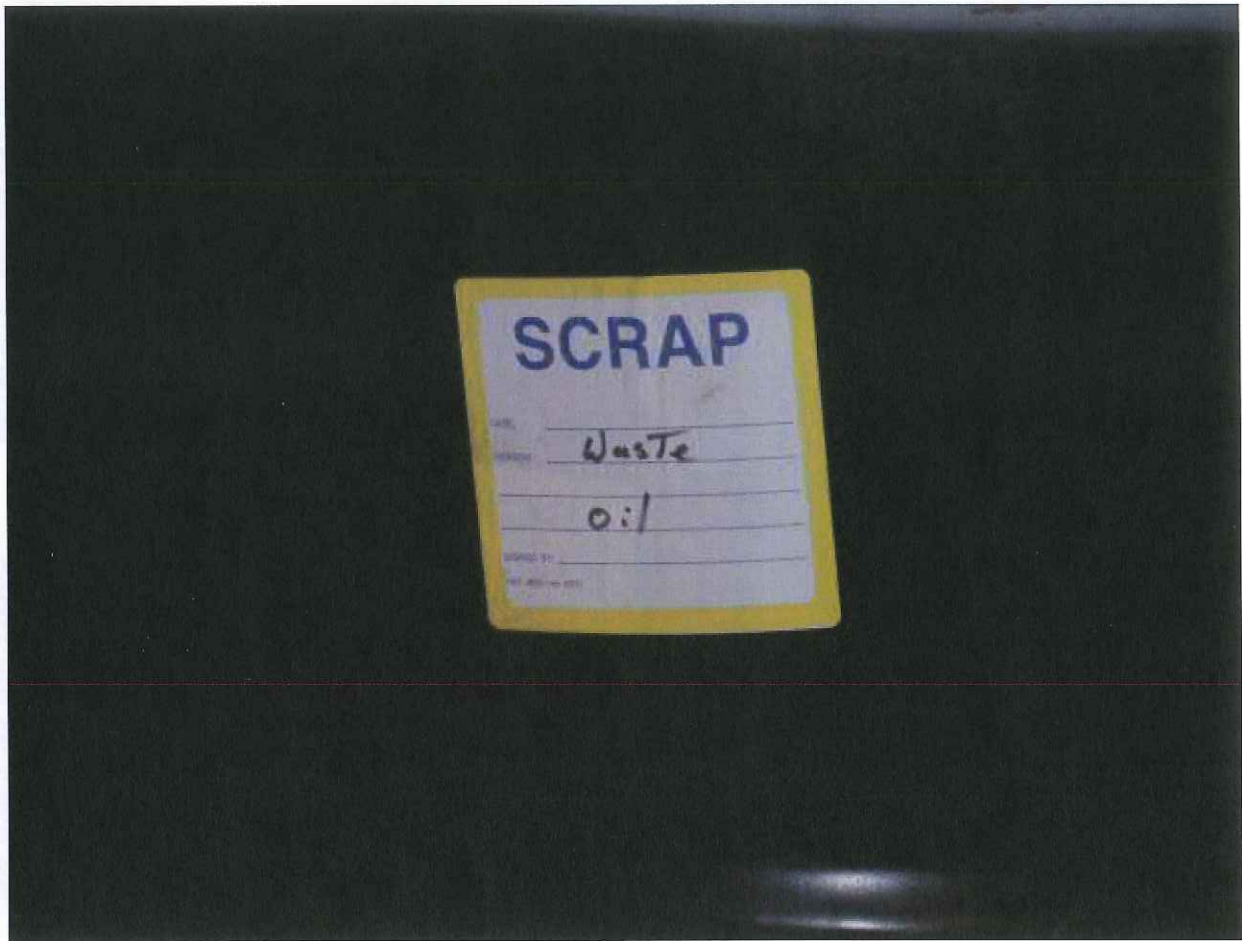
1. A view, outside at the dust collector system, of 55-gallon drums (on pallets) that contained the waste dust, and empty 55-gallon drums (on pallets) to be utilized in the system.

Henkel Corporation, Oak Creek, WI  
Bryan Gangwisch, U.S. EPA 5/26/15



2. A view, at the Main Production Hot Melt Area, of four 55-gallon drums that were situated on a pallet. All four drums contained used oil as stated by Mr. Schultz. All four drums were labeled as "Waste Oil and Scrap."

Henkel Corporation, Oak Creek, WI  
Bryan Gangwisch, U.S. EPA 5/26/15



3. A view, at the Main Production Hot Melt Area, of a label on one of the same four 55-gallon drums as in photo # 2. All four drums contained used oil as stated by Mr. Schultz. All four drums were labeled as "Waste Oil and Scrap."

Henkel Corporation, Oak Creek, WI  
Bryan Gangwisch, U.S. EPA 5/26/15



4. Another view, at the Main Production Hot Melt Area, of a label on one of the same four 55-gallon drums as in photos # 2 and # 3. All four drums contained used oil as stated by Mr. Schultz. All four drums were labeled as "Waste Oil and Scrap."

Henkel Corporation, Oak Creek, WI  
Bryan Gangwisch, U.S. EPA 5/26/15

5/26/15

Hentel Corporation

WID057163941



Revision: 10/31/2011  
WASTE & MATERIALS  
MANAGEMENT PROGRAM

## SMALL QUANTITY GENERATOR INSPECTION

This Inspection Form, used for the inspection of facilities that generate between 100 kg (220 lbs) and 1000 kg (2205 lbs) of non acute hazardous waste in a calendar month and less than 1 kg of acute hazardous waste in a calendar month, evaluates facility compliance with Wisconsin's Hazardous Waste Management Rules (chapter NR 660 - 679, Wis. Admin. Code).

### Section 1: Waste Information

A. Hazardous waste determination has been made on each solid waste generated (NR 662.011).	Y	662.190(2) Photo <input type="checkbox"/>
B. The waste determination has been made correctly, considering the listed waste definitions and the characteristics of the waste, in light of the materials or processes used (NR 662.011(3)).	Y	662.190(2) Photo <input type="checkbox"/>
C. Waste samples are analyzed by laboratories certified or registered under NR 149. Provide lab names and certification numbers (NR 662.011(3)(a)1): <i>U.S. Analytical Lab #445134030</i>	Y	662.190(2) Photo <input type="checkbox"/>
D. Generator keeps records of all waste determinations on-site for at least three years from the date the waste was last sent to a storage, treatment or disposal facility.	Y	662.193(1)(b) Photo <input type="checkbox"/>
E. Generator submitted a notification form and obtained an EPA ID# (NR 662.012).  Note: A subsequent notification should be submitted when there is an ownership or name change.	Y	662.190(2) Photo <input type="checkbox"/>

### Section 2: Manifest, Pre-Transport Requirements and Off-Site Shipments

A. Generator sends waste off-site to be reclaimed under a contractual agreement. If NO, go to Question 2.E.	N	Photo <input type="checkbox"/>
B. Type of waste and frequency of shipments are specified in the contractual agreement.	N/A	662.191(1)(a) Photo <input type="checkbox"/>
C. Vehicle used to transport the waste to the recycler and back to the generator is owned and operated by the reclaimer.	N/A	662.191(1)(b) Photo <input type="checkbox"/>
D. Copy of the reclamation agreement is maintained for at least 3 years from the date the agreement is terminated or expires.	N/A	662.191(2) Photo <input type="checkbox"/>
E. Generator sends hazardous waste off-site that is not reclaimed under a contractual agreement. If NO, go to Question 2.K.	Y	Photo <input type="checkbox"/>
F. The manifest is used according to the instructions in the appendix to 40 CFR part 262 (NR 662.020(1)).	Y	662.190(2)(a) Photo <input type="checkbox"/>
G. The facility designated on the manifest is permitted or licensed to accept the waste (NR 662.020(2)).	Y	662.190(2)(a) Photo <input type="checkbox"/>
H. For out-of-state shipments, a copy of the manifest is sent to the department within 30 days of receiving the signed copy from the designated facility (NR 662.023(3)).	Y	662.190(2)(a) Photo <input type="checkbox"/>
I. Manifest continuation form, EPA form 8700-22A, is prepared according to the instructions in the appendix of 40 CFR part 262 (NR 662.020(1)).	Y	662.190(2)(a) Photo <input type="checkbox"/>
J. If the generator received a shipment back as a rejected load, the returned waste has been accumulated in compliance with the container or tank standards for less than 180 days.	N/A	662.192(5) Photo <input type="checkbox"/>



Revision: 10/31/2011  
WASTE & MATERIALS  
MANAGEMENT PROGRAM

## SMALL QUANTITY GENERATOR INSPECTION

### Section 2: Manifest, Pre-Transport Requirements and Off-Site Shipments

K. Upon receipt of the rejected shipment, the generator signed EITHER of the following: 1. Manifest Item 18c if the transporter returned the shipment using the original manifest. 2. Manifest Item 20 if the transporter returned the shipment using a new manifest.	N/A	662.192(5) Photo <input type="checkbox"/>
L. Copy of the manifest is signed by the generator and retained until the signed copy from the designated facility is received.	Y	662.193(1)(a) Photo <input type="checkbox"/>
M. Copy of each manifest is kept for at least three years from the date of shipment.	Y	662.193(1)(a) Photo <input type="checkbox"/>
N. Hazardous waste is packaged according to applicable DOT requirements before transport (NR 662.030).	Y	662.190.(2) Photo <input type="checkbox"/>
O. Hazardous waste is labeled according to applicable DOT requirements before transport (NR 662.031).	Y	662.190(2) Photo <input type="checkbox"/>
P. Hazardous waste is marked according to applicable DOT requirements before transport (NR 662.032(1)).	Y	662.190(2) Photo <input type="checkbox"/>
Q. Containers of 119 gallons and less are marked with the "Hazardous Waste - Federal law prohibit improper disposal" label before transport (NR 662.032(2)).	Y	662.190(2) Photo <input type="checkbox"/>
R. Placards are offered to the initial transporter (NR 662.033).	Y	662.190(2) Photo <input type="checkbox"/>

### Section 3: Land Disposal Restrictions

A. Generator determined if each waste is prohibited from land disposal by lab analysis or generator knowledge.	Y	668.07(1) Photo <input type="checkbox"/>
B. Generator complies with the prohibition against dilution of wastes.	Y	668.03 Photo <input type="checkbox"/>
C. A one-time written notice is sent to each treatment, storage or disposal facility with the initial waste shipment.	Y	668.07(1) Photo <input type="checkbox"/>
D. A new notification is sent to the TSD and maintained in the generator file when the waste or receiving facility changes.	Y	668.07(1) Photo <input type="checkbox"/>
E. If the waste MEETS treatment standards, the LDR notice certifies the wastes may be land disposed without further treatment.	N/A	668.07(1) Photo <input type="checkbox"/>
F. If the waste EXCEEDS treatment standards, the LDR notice notifies of appropriate treatment and applicable prohibitions.	Y	668.07(1) Photo <input type="checkbox"/>
G. Copy of the LDR notifications and certifications are retained for at least 3 years from the date the waste was last sent off-site.	Y	668.07(1)(h) Photo <input type="checkbox"/>



## SMALL QUANTITY GENERATOR INSPECTION

### Section 3: Land Disposal Restrictions

H. Generator with a contractual agreement complies with BOTH of the following:

1. The notification and certification requirements for the initial shipment of the waste subject to the agreement.
2. Retains a copy of the notification and certification with the tolling agreement for at least 3 years after the agreement is terminated or expires.

N/A

668.07(1)(j)

Photo ☐

I. Underlying hazardous constituents have been identified for characteristic wastes.

Y

668.09(1)

Photo ☐

J. Generator identifies EITHER of the following when the waste is both a listed and characteristic waste:

1. The treatment standards for the listed waste code, in lieu of the treatment standard for the characteristic waste code.
2. The treatment standards for all applicable listed and characteristic waste codes.

N/A

668.09(2)

Photo ☐

K. If waste is treated in containers or tanks, the generator meets with BOTH of the following (NR 668.07(1)(e)):

1. Developed a waste analysis plan describing the procedures used to meet applicable LDR treatment standards.
2. Complies with the certification requirements in NR 668.07(1)(c).

N/A

662.192(1)(d)

Photo ☐

### Section 4: Annual Reports and Exception Reporting

A. Annual reports covering generator activities during the previous calendar year have been submitted to the Department by March 1 of the following year.

Y

662.193(3)

Photo ☐

B. Copy of each annual report is kept for at least 3 years from the due date of the report.

Y

662.193(1)(c)

Photo ☐

C. If the signed manifest copy is not received in 60 days, a legible copy of the manifest indicating no confirmation of delivery was submitted to the department.

N/A

662.193(2)

Photo ☐

### Section 5: Preparedness and Prevention

A. Generator has ALL of the following equipment, unless the equipment is not necessary for the types of wastes handled (665.0032):

1. Device to summon emergency assistance (e.g., telephone, 2 way radio).
2. Internal communications and alarm systems.
3. Portable fire extinguishers.
4. Fire control equipment, including special extinguishing equipment.
5. Spill control equipment.
6. Decontamination equipment (e.g., eyewash, shower).
7. Water at adequate volume and pressure to supply water spray systems.

Y

662.192(1)(d)

Photo ☐

B. All of the above emergency equipment is tested and maintained to assure its proper operation in an emergency (665.0033).

Y

662.192(1)(d)

Photo ☐

C. There is immediate access to internal or external alarms or an emergency communication device in hazardous waste handling areas (665.0034).

Y

662.192(1)(d)

Photo ☐



Revision: 10/31/2011  
WASTE & MATERIALS  
MANAGEMENT PROGRAM

## SMALL QUANTITY GENERATOR INSPECTION

### Section 5: Preparedness and Prevention

D. Generator has made ALL of the following arrangements with emergency organizations (NR 665.0037(1)):

1. Primary and support roles have been defined if multiple police and fire departments could respond to an emergency.
2. Police, fire and emergency response teams are familiar with the site layout, hazards of the waste handled, places where personnel work, entrances and roads in the site and possible evacuation routes.
3. Agreements are made with emergency response contractors and equipment suppliers.
4. Local hospitals are familiar with the properties of wastes handled and the potential resulting injuries or illnesses.

Y

662.192(1)(d)

Photo ☐

E. Aisle space is provided throughout the facility to allow for the unobstructed movement of personnel and all emergency equipment (NR 665.0035).

Y

662.192(1)(d)

Photo ☐

### Section 6: Emergency Procedures & Personnel Training Requirements

A. A person has been identified as an emergency coordinator who is responsible for coordinating all emergency response measures and is on the premises or able to reach the site within a short period of time.

Y

662.192(1)(e)1

Photo ☐

B. ALL of the following information is posted next to the telephone:

1. Name and telephone number of the emergency coordinator.
2. Location of fire extinguishers, spill control material and, if present, fire alarm.
3. Telephone number of the fire department unless the generator has a direct alarm.

Y

662.192(1)(e)2

Photo ☐

C. In the event of an emergency, the emergency coordinator takes the following actions:

1. In the event of a release, telephone the division of emergency management (800-943-0003) and comply with NR 706.
2. In the event of a fire, call the fire department or attempt to extinguish the fire, if appropriate.
3. In the event of a spill, contain the flow of hazardous waste to the extent possible and clean up the hazardous waste and contaminated materials or soil.
4. If there is a release that could threaten human health outside the facility or if a spill reaches surface water, immediately notify the national response center (800-424-8802).

Y

662.192(1)(e)4

Photo ☐

D. All employees are thoroughly familiar with proper waste handling and emergency procedures relevant to their responsibilities during normal operations and emergencies.

Y

662.192(1)(e)3

Photo ☐

### Section 7: Container Accumulation

A. Generator accumulates hazardous waste in containers. If NO, go to Section 8.

N

Photo ☐

B. The accumulation start date is clearly marked and visible for inspection on each container.

N/A

662.192(1)(d)1

Photo ☐

C. All containers are clearly marked with the words "Hazardous Waste".

N/A

662.192(1)(d)2

Photo ☐

D. The contents of a container that is leaking or in poor condition are transferred to another container in good condition (NR 665.0171).

N/A

662.192(1)(b)

Photo ☐



Revision: 10/31/2011  
WASTE & MATERIALS  
MANAGEMENT PROGRAM

## SMALL QUANTITY GENERATOR INSPECTION

### Section 7: Container Accumulation

E. Containers are made or lined with materials compatible with the waste (NR 665.0172).	N/A	662.192(1)(b) Photo <input type="checkbox"/>
F. Containers are kept closed except when it is necessary to add or remove waste (NR 665.0173(1)).	N/A	662.192(1)(b) Photo <input type="checkbox"/>
G. Containers are opened, handled or stored to prevent leaks or ruptures (NR 665.0173(2)).	N/A	662.192(1)(b) Photo <input type="checkbox"/>
H. Container storage areas are inspected weekly for leaks and deterioration (NR 665.0174).	Y	662.192(1)(b) Photo <input type="checkbox"/>
I. Incompatible wastes are stored in separate containers unless the mixing will not generate extreme heat, fire, explosion, toxic gases or other dangers (NR 665.0177(1)).	N/A	662.192(1)(b) Photo <input type="checkbox"/>
J. Containers of incompatible wastes are separated or protected from each other by a physical barrier (dike, berm, wall or other device) (NR 665.0177(3)).	N/A	662.192(1)(b) Photo <input type="checkbox"/>
K. Containers that previously held waste are properly washed before adding incompatible waste, unless the mixing will not generate extreme heat, fire, explosion, toxic gases or other dangers (NR 665.0177(2)).	N/A	662.192(1)(b) Photo <input type="checkbox"/>

### Section 8: Satellite Accumulation

A. Waste is accumulated in satellite accumulation areas. If NO, go to Section 9.	Y	Photo <input type="checkbox"/>
B. Generator accumulates no more than 55 gallons of hazardous waste or 1 quart of acute hazardous waste in each satellite area.	Y	662.192(4)(a) Photo <input type="checkbox"/>
C. Satellite containers are under the control of the operator of the process generating the waste.	Y	662.192(4)(a) Photo <input type="checkbox"/>
D. Containers are always kept closed except when it is necessary to add or remove waste (NR 665.0173(1)).	Y	662.192(4)(a)1 Photo <input type="checkbox"/>
E. Containers are made of or lined with materials that are compatible with the waste (NR 665.0172).	Y	662.192(4)(a)1 Photo <input type="checkbox"/>
F. Containers are marked "Hazardous Waste" or with other words that identify the contents.	Y	662.192(4)(a)2 Photo <input type="checkbox"/>
G. If the container is leaking or in poor condition, contents are transferred to another container in good condition (NR 665.0171).	N/A	662.192(4)(a)1 Photo <input type="checkbox"/>
H. Container holding the excess waste is marked with the date the excess amount begins accumulating.	N/A	662.192(4)(b) Photo <input type="checkbox"/>



Revision: 10/31/2011  
WASTE & MATERIALS  
MANAGEMENT PROGRAM

## SMALL QUANTITY GENERATOR INSPECTION

### Section 8: Satellite Accumulation

I. Generator complies with the 180 day accumulation requirements with respect to the excess amount within 3 days of it being generated.

N/A

662.192(4)(b)

Photo ☐

### Section 9: Used Oil

A. Used oil is managed on-site. If NO, go to Section 10.

Y

Photo ☐

B. Used oil containing  $\geq 1,000$  ppm halogens is managed as listed hazardous waste or the rebuttable presumption requirements have been met.

N/A

679.10(2)(a)2

Photo ☐

C. Used oil containers and tanks are in good condition and not leaking.

Y

679.22(2)

Photo ☐

D. Used oil containers and tanks are marked "used oil".

four 55-gallon drums

N

679.22(3)(a)

Photo ☐

E. Transporter has an EPA ID number, except when generator self-transport or has a tolling agreement.

Y

679.24

Photo ☐

F. Used automotive oil filters and oil absorbent material are not land filled, except if less than 1 gallon absorbent results from a non-routine spill.

N/A

Photo ☐

G. If used oil is burned in an on-site used oil-fired space heater, all of the following are met:

1. Only used oil from the generator or household do-it-yourselfers is burned.
2. The heater is designed with a maximum capacity of 0.5 million BTU per hour or less.
3. The combustion gases are vented to the ambient air.

N/A

679.23

Photo ☐

H. If used oil is accepted from others or sent off-site to be burned in a space heater, the used oil meets fuel specifications and the marketer requirements in NR 679 subch. H are met.

N/A

679.11

Photo ☐

### Section 10: Waste Minimization Certification

A. Small quantity generator has made a good faith effort to minimize the amount of waste generated (NR 662.027(2)).

Y

662.190(2)(a)

Photo ☐

### Section 11: Generator Status Evaluation

A. Between 220 lbs (100 kg) and 2,205 lbs (1,000 kg) of waste is generated in any month.

Y

662.190(1)

Photo ☐

B. Waste is accumulated for 180 days or less.

No hazardous waste in accumulation during the inspection (only SAA)

N/A

662.192(1)

Photo ☐

C. Waste is accumulated for 270 days or less if the generator must ship 200 miles or more.

N/A

662.192(2)

Photo ☐



# SMALL QUANTITY GENERATOR INSPECTION

Revision: 10/31/2011  
WASTE & MATERIALS  
MANAGEMENT PROGRAM

## Section 11: Generator Status Evaluation

D. Less than 13,230 lbs (6,000 kg) of waste is accumulated.

Y

662.192(1)(a)

Photo ☐

E. Describe any other activities the generator is conducting at the facility.

Universal waste accumulation  
(bulbs & batteries)

Photo ☐



5/26/15

Henkel Corporation

WID057163941



Revision: 03/27/2012  
WASTE & MATERIALS  
MANAGEMENT PROGRAM

## UNIVERSAL WASTE HANDLER INSPECTION REPORT - SMALL QUANTITY HANDLER

This Inspection Form, used for the inspection of facilities that generate or handle less than 5000 kg of universal waste (hazardous waste batteries, pesticide, lamps, antifreeze, and some mercury containing devices), evaluates facility compliance with Wisconsin's Hazardous Waste Management Rules (chapters NR 660-679, Wis. Admin. Code). The Universal waste regulations streamline the requirements for hazardous waste batteries, pesticide, lamps, antifreeze, and some mercury containing devices. Persons treating, disposing, recycling, or otherwise processing universal wastes are subject to applicable hazardous waste regulations.

### Section 1: Prohibitions

A. Universal waste is not disposed on-site.	Y	673.11(1) Photo <input type="checkbox"/>
B. Universal waste is not diluted or treated on-site.  Note: Dilution or treatment does not include: sorting, mixing, discharging, regenerating, or disassembling batteries; removing batteries from consumer products or removing electrolytes; removing thermostat ampules; or, responding to a release of universal waste.	Y	673.11(2) Photo <input type="checkbox"/>

### Section 2: General Standards

A. Universal waste batteries and thermostats that are broken or show evidence of leakage or spillage are placed in closed, structurally sound containers that are compatible with the waste and are not leaking.	N/A	673.13 Photo <input type="checkbox"/>
B. Universal waste pesticides and lamps are placed in closed, structurally sound containers that are compatible with the waste and not leaking.	Y	673.13 Photo <input type="checkbox"/>
C. Sorting, mixing or handling of batteries is only conducted if the battery casing is not breached and remains intact.	Y	673.13(1)(b) Photo <input type="checkbox"/>
D. Wastes generated by handling or cleaning up spills of universal wastes are managed according to hazardous waste or solid waste rules.	N/A	673.13 Photo <input type="checkbox"/>
E. If mercury containing ampules are removed from thermostats, the handler meets ALL of the following: 1. Ampules are removed in a manner to prevent breakage. 2. Removal is conducted over a containment device. 3. Spills or leaks are immediately cleaned up. 4. Activity is performed in a well ventilated, monitored environment.	N/A	673.13(3)(b) Photo <input type="checkbox"/>
F. Pesticides are placed in a tank that meets NR 665 subch. J requirements, except closure and post closure requirements in NR 665.0197(3) and waste analysis requirements in NR 665.0200.	N/A	673.13(2) Photo <input type="checkbox"/>
G. Pesticides are placed in a transport vehicle or vessel that is closed, structurally sound, not leaking and compatible with the waste.	N/A	673.13(2) Photo <input type="checkbox"/>
H. All universal wastes are labeled or marked "Waste" or "Used" followed by the specific type of universal waste handled or "Universal Waste".	Y	673.14 Photo <input type="checkbox"/>
I. Containers, tanks, or transport vehicles of recalled pesticides are additionally marked with the label that was on or accompanied the product when it was sold or distributed.	N/A	673.14 Photo <input type="checkbox"/>
J. Length of accumulation time is demonstrated by any of the following: 1. Mark or label each container with the earliest date the waste is generated or received. 2. Mark or label the individual item of waste with the date it was generated or received. 3. Maintain an inventory system identifying the date the waste was generated or received. 4. Place the universal waste in a specific accumulation area identified with the earliest date the waste was generated or received. 5. Use some other method that clearly demonstrates the length of accumulation time.	Y	673.15(3) Photo <input type="checkbox"/>
K. Universal waste is accumulated for less than one year from the date generated or received from another handler.	Y	673.15(1) Photo <input type="checkbox"/>

Code/Stat ? : C: Compliance CA: Compliance with Concern R: Returned to Compliance X: Non-Compliance NA: Inspected, Not Applicable ND: Inspected, Not Determined NI: Not Inspected  
Noncode ? : Y: Yes N: No UN: Unknown

Notes : \*: Dept. approved alternate may apply No 'box' is an open ended question

Page 1 of 2

d\_report\_inspection\_print\_ff



Revision: 03/27/2012  
WASTE & MATERIALS  
MANAGEMENT PROGRAM

## UNIVERSAL WASTE HANDLER INSPECTION REPORT - SMALL QUANTITY HANDLER

### Section 2: General Standards

L. If universal waste is accumulated beyond one year, the handler can prove that accumulation was necessary to facilitate proper recovery, treatment or disposal.	N/A	673.15(2) Photo <input type="checkbox"/>
M. Employees are trained on the proper handling and emergency procedures appropriate to the types of waste handled at the facility.	Y	673.16 Photo <input type="checkbox"/>
N. Handler complies with ALL of the following when a release occurs: 1. Immediately contains the release. 2. Determines if the spill residue is hazardous waste. 3. If hazardous waste, disposes of it as such.	N/A	673.17 Photo <input type="checkbox"/>

### Section 3: Off-site Shipments

A. Handler sends the waste to a destination facility, foreign destination or another handler.	Y	673.18(1) Photo <input type="checkbox"/>
B. Handler that self-transportes complies with ALL of the following: 1. Applicable US DOT regulations in 49 CFR parts 171 to 180 when transporting universal waste that meets the definition of hazardous materials. 2. Immediately contain release and make waste determination on spill residue. 3. If shipped to a foreign destination other than an OECD country, use an EPA acknowledgement of consent.	N/A	673.18(2) Photo <input type="checkbox"/>
C. For hazardous materials, the handler packages, labels, marks, placards and prepares the proper shipping papers in accordance with DOT requirements in 49 CFR parts 172 to 180.	Y	673.18(3) Photo <input type="checkbox"/>
D. When shipping to another universal waste handler, the handler has agreed to receive the shipment.	Y	673.18(4) Photo <input type="checkbox"/>
E. If a shipment was rejected, EITHER of the following occurred: 1. The waste was sent back to the originating handler. 2. The originating handler agreed on a destination facility to which to ship the waste.	N/A	673.18 Photo <input type="checkbox"/>
F. If a shipment contains hazardous waste, the handler receiving the shipment immediately notifies the Department.	N/A	673.18(7) Photo <input type="checkbox"/>
G. Nonhazardous, nonuniversal waste, in a universal waste shipment is managed in compliance with the solid waste requirements.	N/A	673.18(8) Photo <input type="checkbox"/>

Code/Stat ? : C: Compliance CA: Compliance with Concern R: Returned to Compliance X: Non-Compliance NA: Inspected, Not Applicable ND: Inspected, Not Determined NI: Not Inspected

Noncode ? : Y: Yes N: No UN: Unknown

Notes : \*: Dept. approved alternate may apply

No 'box' is an open ended question

Page 2 of 2

d\_report\_inspection\_print\_ff